



Paul Thompson
Stratford-on-Avon District Council
Elizabeth House
Church Street
Stratford-upon-Avon
Warwickshire
CV37 6HX

By email only to: paul.thompson@stratford-dc.gov.uk

7 August 2023

Dear Paul,

APPLICATION NO: 23/00679/FUL

DESCRIPTION: Conversion, partial rebuild of barn and alterations of farm buildings to form a holiday let unit

LOCATION: Turnpike Hill Barn, Long Compton, Shipston-on-Stour, CV36 5EY

Thank you for consulting the Cotswolds National Landscape Board¹ ('the Board') on this proposed development, which would be located within the Cotswolds National Landscape².

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.³ The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications⁴:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2023-2025 ([link](#)), in particular policies CE1 (Landscape), UE3 (Sustainable Tourism), CE4 (Tranquillity) and CE5 (Dark Skies);
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Types (LCT) 7 (High Wold) and 15 (Farmed Slopes);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 7 ([link](#)) including Section 7.2 and LCT 15 ([link](#)) including Section 15.2;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#)) particularly, in this instance, with regards to Chapter 4 (The Built Environment) ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Tranquillity Position Statement ([link](#)) and Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

For the reasons outlined below, the Board wishes to raise a **holding objection** to this application and would invite the applicant to provide further information to demonstrate compliance with Policy CS.11 of the Stratford Core Strategy, Policy E3 of the Long Compton Neighbourhood Plan and consistency with the Board's Management Plan policies and other published guidance.

Policy CS.11 of the Core Strategy states that development proposals involving land either within, or outside but affecting, the Cotswolds AONB should conserve and enhance the special landscape qualities and scenic beauty of the AONB and be consistent with the objectives set out in the

Cotswolds Conservation Board

Cotswold Business Centre
2 A P Ellis Road, Upper Rissington
Cheltenham, Gloucestershire GL54 2QB
07841 663607
info@cotswoldsaonb.org.uk

The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

Cotswolds AONB Management Plan. Those parts of the AONB that lie within the District are defined as 'tranquil areas' where the minimisation of noise, traffic congestion and light pollution is a priority.

Paragraph 185c of the NPPF states that planning decisions should ensure that new development is appropriate for its location and in doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Paragraph 001 of the Planning Practice Guidance (PPG) on Light Pollution (Paragraph: 001 Reference ID: 31-001-20191101) states that 'intrinsically dark landscapes' are those entirely, or largely, uninterrupted by artificial light. National parks ... can serve as good examples'. As AONBs have the same level of protection with regards to landscape and scenic beauty as national parks within the NPPF and PPG and dark skies are one of the special qualities of the Cotswolds National Landscape, we consider it reasonable to treat the National Landscape as an 'intrinsically dark landscape' in NPPF and PPG terms.

The Cotswolds AONB Landscape Strategy & Guidelines for LCT 7 (Section 7.2) referred to above identifies the '*introduction of lit elements to characteristically dark landscapes*' as a potential adverse implication of development such as this. The guidelines seek to '*conserve areas of dark skies*'.

As such, the introduction of any lit elements should be designed to adhere to this guidance and, by extension, with the policies of the Cotswolds AONB Management Plan in particular Policy CE5 (Dark Skies) which states that proposals that are likely to impact on the dark skies of the Cotswolds AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution.

The proposals feature a number of rooflights and full-length windows in the elevations, including those looking north. No further detail has been provided in terms of external lighting for the property including the garden, parking area or driveway. Lighting in any of these locations are potential sources of night-time light spill and/or glow.

In the first instance we would request that the applicant provides further information on any proposed external lighting and how the proposal will minimise and where possible reduce light pollution. The applicant should also demonstrate that the proposal complies with Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of our Position Statement on Dark Skies and Artificial Light referenced above) and other relevant guidance mentioned above. We would recommend that the relevant 'environmental zone' for which compliance should be assessed is Environmental Zone E1 which relates to AONBs.

Without prejudice, if the local authority is minded to grant planning permission, planning conditions should be imposed which seek to mitigate any adverse impact and ensure that all lighting meets the standards outlined above and will be limited to low-level, down-facing lights to preserve the landscape character of the Cotswolds National Landscape.

Please do not hesitate to contact me if you wish to discuss this response.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'S. Joyce', with a stylized flourish at the end.

Simon Joyce MRTPI

Planning Officer

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 2) The name used for the organisation associated with the AONB designation is the Cotswolds National Landscape Board. At times this is abbreviated to National Landscape Board or The Board. The legal name of the organisation remains the Cotswolds Conservation Board but this name is no longer used in most circumstances.
- 3) Section 85 of the Countryside and Rights of Way Act 2000.
www.legislation.gov.uk/ukpga/2000/37/section/85
- 4) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
 - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2023-2025
www.cotswoldsaonb.org.uk/management-plan
 - b. Cotswolds AONB Landscape Character Assessment
www.cotswoldsaonb.org.uk/lca
 - c. Cotswolds AONB Landscape Strategy and Guidelines
www.cotswoldsaonb.org.uk/lsg
 - d. Cotswolds AONB Local Distinctiveness and Landscape Change
www.cotswoldsaonb.org.uk/ldlc
 - e. Cotswolds Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2